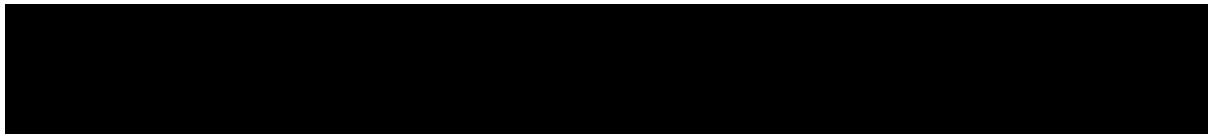


EXHIBIT 3



Chestney, Isabella

From: Zhao, Yanan
Sent: Friday, November 17, 2023 11:30 PM
To: Park, Ryuk; McCullough, Matt; Winston-Micron-Netlist; ce@wsfirm.com; wh@wsfirm.com; andrea@wsfirm.com; mthornberry@haltomdoan.com
Cc: #Netlist-Micron294; Jennifer Truelove (jtruelove@McKoolSmith.com)
Subject: RE: Netlist v. Micron, 22-cv-203/22-cv-294 | deposition

Counsel,

Please see below for a summary of today's call.

Micron has agreed to:

- (1) Supplement its responses to Netlist's First Set of Interrogatories (-294 Case), including Micron's non-infringement position, by tomorrow, 11/18. Netlist will review Micron's supplemental responses to the first and second sets of Netlists' interrogatories and let Micron know what are still insufficient.
- (2) That Netlist can rely on Micron's written discovery responses from 22-cv-203 on the overlapping subject matter (e.g. overlapping accused products and U.S. sales activities).
- (3) Produce/allow cross reference of Micron's expert reports from EDTX, No. 22-cv-203 matter.

Micron stated that it will address Netlist's document production requests in Netlist's 10/31 email. We understand that Micron is not able to respond and produce these documents by Monday. Netlist plans to move to compel in accordance with the Court's scheduling order.

As indicated during the call, Netlist reserves the right to supplement its expert reports in light of Micron's late interrogatory responses and document production.

Netlist will produce expert reports from prior cases involving overlapping products, including the same reports Netlist agreed to produce in the -203 action from the Hynix ITC case, subject to Micron receiving approval from SK Hynix and/or Samsung. Netlist also plans to supplement its interrogatory responses, including its validity position. We will also consider providing further supplemental responses if Micron explains what specific information it seeks.

Last, in our previous email, we asked Micron to supplement its responses to Netlist's RFAs. Some of these responses provided by Micron appear to be incorrect. For instance, RFA No. 12 asks for information regarding Micron's accused DDR4 RDIMMs, but Micron's response addresses LRDIMMs. Please confirm Micron will promptly address this issue.

Best,
Yanan

Yanan Zhao

Associate

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Los Angeles, CA 90067

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